

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
(Bid Protest)

CLASSIC AIR CHARTER, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES,)	No. 25-286C
)	Judge Hertling
Defendant,)	
)	
and)	
)	
CSI AVIATION, INC.)	
)	
Defendant-Intervenor.)	
)	

DEFENDANT’S MOTION TO STAY

Defendant, the United States, respectfully requests that the Court stay all proceedings in this case for eight days, through and including April 18, 2025. Counsel for defendant-intervenor, CSI Aviation, Inc. (CSI), has indicated that CSI does not oppose this motion. Counsel for plaintiff, Classic Air Charter, Inc. (CAC), has indicated that CAC does not take a position on the motion to stay, and that CAC reserves its right to object to any further action taken by the agency, such as a cancellation of the solicitation, voluntary corrective action, or motion for voluntary remand.

Good cause supports this motion to stay. Counsel for the United States has been advised that Immigration and Customs Enforcement (ICE) procurement staff intend to recommend terminating the existing award to CSI and cancelling the solicitation that is the subject of this protest. Authority for that decision resides with the Deputy Secretary of Homeland Security. ICE expects to receive the Deputy Secretary’s decision on the recommendation by next

Wednesday, April 16th. If the Deputy Secretary accepts the recommendation to terminate the award and cancel the solicitation, that would moot the underlying protest. A stay would avoid requiring the parties and the Court to expend additional resources by continuing the briefing schedule over a matter that may become moot.

For these reasons, we respectfully request that the Court stay all proceedings in this case for eight days, through and including April 18, 2025.

Respectfully submitted,

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